

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

AVARD W. PEREIRA,) CIV. NO. 04-00371 SPK/LEK
) (Civil Rights)
Plaintiff,)
)
vs.)
)
DR. SISAR PADERES)
and DOES 1-10,) DECLARATION OF JACK
) SCHWEIGERT, ESQ.
Defendants.)
)

DECLARATION OF JACK SCHWEIGERT, ESQ.

I, Jack Schweigert, declare as follows:

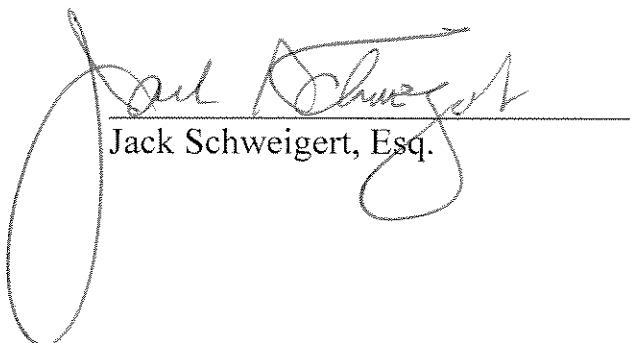
1. I am lead counsel for Plaintiff in this matter.
2. I thought I had the medical records of my client but in fact I only have a portion of those medical records. These medical records are needed to identify whether there are any additional defendants that should be named or amendments to the pleadings that should be made.
3. When I learned of this fact, I filed a request for production of documents with Defendants on June 27, 2006.
4. I attempted to call Deputy Attorney General Christine Savage, who is the responsible attorney on this case, to see if she would agree to stipulate

to this amendment but learned she is on leave.

5. Because the present deadline is today and Ms. Savage is on leave, I am filing this motion in good faith and not for purposes of needless delay.

I declare under penalty of law the foregoing is true and correct.

Executed in Honolulu, Hawaii this 7th day of July, 2006.



Jack Schweigert, Esq.